

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE GOL LINHAS AÉREAS
INTELIGENTES S.A. SECURITIES
LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 1:20-cv-04243-RPK-RER

**NOTICE OF DEFENDANTS' MOTION
TO DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Declaration of Robert J. O'Loughlin and the exhibits annexed thereto, and all other papers and proceedings herein, Defendants GOL Linhas Aéreas Inteligentes S.A., Paulo Sergio Kakinoff, and Richard F. Lark, Jr., by and through their attorneys, hereby respectfully move this Court, before the Honorable Rachel P. Kovner, United States District Judge, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an order, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act (“PSLRA”), 15 U.S.C. 78u-4 *et seq.*, dismissing with prejudice Plaintiffs’ Amended Complaint (Dkt. 12). The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: May 7, 2021

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

BY: /s/ Audra J. Soloway

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